

**REMARKS**

In order to expedite prosecution, claims 7, 10, 11, 13 and 14 have been canceled without prejudice/disclaimer to the subject matter embodied thereby, rendering the rejections thereto moot.

Claims 1, 8, 9, and 12 are independent and stand rejected under 35 U.S.C. § 102 as being anticipated by Kanade et al. '083 ("Kanade"). This rejection is respectfully traversed for the following reasons.

**A. Claims 1, 9 and 12**

The Examiner relies on col. 6, lines 5-33 of Kanade as allegedly disclosing the claimed 'synchronized data in relation to the disclosed "genlock signal" of Kanade. However, as described in the relied on portions of Kanade, the disclosed "genlock signal" merely effects the shutter for each camera 18 to fire at precisely the same time (col. 6, lines 29-32). In this regard, the alleged synchronized data of Kanade merely functions to synchronize the clock phases of the alleged child devices with that of the parent device.

In contrast, each of claims 1, 9 and 12 recites in pertinent part, "synchronized data for time synchronization which includes a synchronization *pattern* for establishing *frame* synchronization" (emphasis added). As described on page 10, line 3 – page 11, line 23 of Applicants' specification with respect to Figure 4, synchronization data may include a preamble signal Pa and a synchronization pattern Syw, where the preamble signal Pa may be a signal alternately having a value of "1" and "0" and including a clock component of the system. The preamble signal Pa can work as a reference signal by which the child devices adjust their clock phase to that of the parent device.

At best, the "genlock signal" of Kanade would correspond to such a preamble signal. Kanade is completely silent as to a synchronization *pattern* for establishing *frame*

synchronization. One exemplary embodiment of such a signal can be, for example, a unique bit pattern of "1" and "0" set by the system as shown in Figure 4 of Applicants' drawings.

**B. Claim 8**

Claim 8, as amended to include language from claim 5, recites in pertinent part, "***said child device*** sends a change demand signal corresponding to a content of change as said control information, and ***said parent device receives*** said change demand signal sent from said child device, ***determines whether or not the content of change corresponding to said change demand signal is permitted***, and when the change is permitted, ***sends a change permission signal and an operation parameter*** for defining operation specification to be employed by said child device after the change" (emphasis added). With regard to this feature of the present invention, the Examiner alleges that Kanade discloses that "the master control unit 24 continuously sends the PTZF parameters to the slave cameras" and concludes that this disclosure "meets the limitation of changing the operation specification of the child device."

However, even assuming *arguendo* the Examiner's relied on portion of Kanade "meets the limitation of changing the operation specification of the child device," the Examiner's allegations are irrelevant to the claimed combination of features recited in claim 8. That is, the Examiner has apparently overlooked substantial portions of the features recited in claim 8. Specifically, in claim 8, as amended, the ***child device*** can send a change demand signal to the parent device; which parent device can then determine whether or not the content of change corresponding to the change demand signal is permitted, and when the change is permitted, can send a change permission signal back to the child device.

In Kanade, the alleged "changing the operation specification of the child device" is not performed in response to a signal ***sent out by the child device***. Rather, Kanade discloses only a

unilateral controlling operation of the child devices by the parent device, whereas the present invention as recited in claim 8 can embody a bidirectional communication scheme in which the child device can issue a change demand signal to which the parent device can respond. Kanade is silent as to the *child device* sending a change demand signal, let alone suggest the particular parent response that can be effected thereby (determine if permitted or not, etc.).

As anticipation under 35 U.S.C. § 102 requires that each and every element of the claim be disclosed, either expressly or inherently (noting that "inherency may not be established by probabilities or possibilities", *Scaltech Inc. v. Retec/Tetra*, 178 F.3d 1378 (Fed. Cir. 1999)), in a single prior art reference, *Akzo N.V. v. U.S. Int'l Trade Commission*, 808 F.2d 1471 (Fed. Cir. 1986), based on the forgoing, it is submitted that the cited prior art does not anticipate the independent claims, nor any claim dependent thereon. The Examiner is directed to MPEP § 2143.03 under the section entitled "All Claim Limitations Must Be Taught or Suggested", which sets forth the applicable standard for establishing obviousness under § 103:

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. (citing *In re Royka*, 180 USPQ 580 (CCPA 1974)).

In the instant case, the pending rejection does not "establish *prima facie* obviousness of [the] claimed invention" as recited in the independent claims because the proposed combinations fail the "all the claim limitations" standard required under § 103.

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are contained in the dependent claims, *Hartness International Inc. v. Simplimatic Engineering Co.*, 819 F.2d at 1100, 1108 (Fed. Cir. 1987). Accordingly, as the independent claims are patentable

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for the reasons set forth above, it is respectfully submitted that all claims dependent thereon are also patentable. In addition, it is respectfully submitted that the dependent claims are patentable based on their own merits by adding novel and non-obvious features to the combination.

Based on the foregoing, it is respectfully submitted that all pending claims are patentable over the cited prior art. Accordingly, it is respectfully requested that the rejections under 35 U.S.C. § 102/103 be withdrawn.


### **CONCLUSION**

Having fully responded to all matters raised in the Office Action, Applicants submit that all claims are in condition for allowance, an indication for which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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